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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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ACT/015/032

TO: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western, Reclamation Engineer *W.H.W.*

RE: Genwal Coal Company Crandall Canyon Mine IBC

DATE: March 1, 1994

GENERAL COMMENTS:

On February 8, 1994 the Division received an application for permit change entitled "Submittal for IBC LBIA #9 UT468082". The reserves at the Crandall Canyon mine have been depleted in Section 36. Mining needs to commence in Sections 25, 30, 31 before LBA #9 amendment approval. The incidental boundary change will allow mining to continue until the LBA has been approved.

R645-301-525.130 Except for those areas where planned subsidence is projected to be used, a detailed description of the subsidence control measures that will be taken to prevent or minimize subsidence and subsidence-related damage, including, but not limited too: 525.131 Backstowing or backfilling of voids; 525.132 Leaving support pillars of coal; 525.133 Leaving areas in which no coal is removed, including a description of the overlying area to be protected by leaving the coal in place; 525.134 Taking measures on the surface to prevent material damage or lessening of the value or reasonably foreseeable use of the surface.

Synopsis of Proposal:

The Applicant proposes dropping the commitment to exclude any mining activity in the IBC area.

Analysis:

The current Mining and Reclamation Plan excludes the Applicant from mining in the IBC area. That commitment must be removed from the MRP before any mining can occur in the IBC area.

In the letter that accompanied the application for permit change the Applicant said that only first mining will occur in the IBC area. That commitment was not included in the application for permit change. The commitment to restrict all mining operations in the



IBC too primary must be included in the MRP.

The Applicant must prove that the pillars in the IBC will prevent subsidence from occurring. The Applicant must supply the Division with the coal's strength and the pillars' dimensions and the safety factors.

Recommendations:

1. The Applicant must commit to only conduct first mining in the IBC area.
2. The Applicant must prove that first mining in the IBC will not result in any subsidence. The information supplied to the Division will include but not be limited to the coal's strength and the pillar's size and safety factor.

R645-301-525.14 Subsidence Monitoring

Synopsis of Proposal:

The Applicant commits to carry out the proposed subsidence control plan and Applicant hereby incorporates the same into this submittal.

The U. S. Forest Service has prepared an aerial monitoring system for the Crandall Canyon Mine which has been accepted for implementation. Vertical and horizontal controls have been established using ground control stations, shown on Plate 5-5.

Aerial surveys will be conducted each year above and within the 20-degree angle of draw of the actual mined area. If no subsidence has occurred at a particular point for a period of two years, the point will be monitored biannually. If the biannual monitoring determines that subsidence has not occurred for three consecutive surveys, then the monitoring will be done on a five year increment.

Analysis:

The Applicant did not state if the subsidence monitoring program would need to be modified to detect ground movement associated with mining in the IBC area. The Applicant needs address how the subsidence monitoring program will be affected by mining in the IBC.

Recommendation:

1. The Applicant must discuss the effects of mining in the IBC area will on the subsidence monitoring program.